

# EXHIBIT B

**UNITED STATES DISTRICT COURT**  
**IN THE EASTERN DISTRICT OF MICHIGAN**

**CLIFTON E. JACKSON and**  
**CHRISTOPHER M. SCHARNITZKE,**

Case No.: 2009-11529  
Judge David M. Lawson

Plaintiffs, on behalf of themselves and  
other persons similarly situated

**SEDGWICK CLAIMS MANAGEMENT**  
**SERVICES, INC, and COCA COLA**  
**ENTERPRISES, INC, foreign corporations,**  
**and DR. PAUL DROUILLARD,**  
**Jointly and Severally,**

Defendants.

MARSHALL LASSER P25573  
MARSHALL LASSER PC  
Attorney for plaintiffs  
po box 2579  
Southfield MI 48037  
248-647-7722  
[mlasserlaw@aol.com](mailto:mlasserlaw@aol.com)  
[ddtalon@gmail.com](mailto:ddtalon@gmail.com)

Thomas W. Cranmer P25252  
Matthew F. Leitman P48909  
Miller Canifield Paddock & Stone, P.L.C.  
Attorneys for Defendant Coca-Cola  
840 West Long Lake Road Ste. 200  
Troy, MI 48098  
248-879-2000  
[cranmer@millercanfield.com](mailto:cranmer@millercanfield.com)  
[leitman@millercanfield.com](mailto:leitman@millercanfield.com)

BUTZEL LONG  
By: Daniel B. Tukul P34978  
Lynn A. Sheehy P38162  
Katherine D. Goudie P62806  
Attorneys for Defendant Dr. Drouillard  
150 W. Jefferson, Ste. 100  
Detroit, MI 48226  
313-225-7000  
[tukul@butzel.com](mailto:tukul@butzel.com)  
[sheehy@butzel.com](mailto:sheehy@butzel.com)  
[goudie@butzel.com](mailto:goudie@butzel.com)

Kathleen H. Klaus P67207  
Attorney for Sedgwick  
28400 Northwestern Hwy., 3<sup>rd</sup> Fl  
Southfield, MI 48034  
248-354-4030  
[khk@maddinhauser.com](mailto:khk@maddinhauser.com)

**PROOF OF SERVICE**

The undersigned certifies that this instrument, together with all referenced attachments, was served on all parties to this case and on their attorneys of record at their respective addresses as disclosed by the pleadings on July 30, 2009 by the following method(s):

☐ U.S. Mail    ☐ Fax    ☐ Hand Delivered  
☐ Federal Express    ☐ UPS  
☒ Other    **ELECTRONICALLY EMAILED**

s. Delilah D. Talon  
Signature of Server

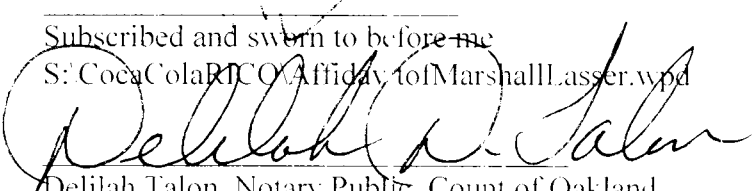
**AFFIDAVIT OF MARSHALL LASSER**

Marshall Lasser, being sworn, states that the statements he makes on page 4 through 6 of this brief concerning the involvement in MI workers compensation claims by large self insured

employers such as Coca Cola are true, based on personal knowledge obtained in years of representing claimants in Michigan workers compensation claims against large self insured defendants such as UPS, DHL, Coca Cola, Cassens Transport, etc. and based on conversations with the lawyers at Lacey & Jones and Conklin, Benham et al, who now represent and have represented these defendants, concerning the involvement of their insureds.

The communications of Coca Cola concerning Michigan workers compensation claims are hidden from public view. They are not part of the Agency file and copies of them are not given to plaintiffs' counsel (whereas Sedgwick does communicate directly with a claimant or his counsel before Sedgwick's counsel appears in a contested matter). Coke communicates with its Michigan workers compensation defense counsel and, on information and belief, with Sedgwick, concerning claims.

Subscribed and sworn to before me  
S:\CocaCola\ICO Affidavit\ofMarshallLasser.wpd

  
Delilah Talon, Notary Public, Count of Oakland

my commission expires 2-20-12

DELILAH D. TALON  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF OAKLAND  
MY COMMISSION EXPIRES Feb 20, 2012  
ACTING IN COUNTY OF